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17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 **Kaleab Mekuriya,**

20 Plaintiff,
21 vs.

22 **The Travelers Indemnity Company;**
23 **Indian Harbor Insurance Company**, a
24 Foreign Corporation; **Constitution State**
25 **Services, LLC**, a Foreign Limited-Liability
26 Company; Does 1 through 10, inclusive
27 and Roe Corporations 1 through 10,
28 inclusive,

Defendants.

Case No.: 2:22-cv-00214-JCM-EJY

29 **STIPULATION AND ORDER TO**
30 **EXTEND DISCOVERY**
31 **(THIRD REQUEST)**

32 Pursuant to Fed R. Civ. P. 6, Fed. R. Civ. P. 26, LR IA 6-1, LR IA 6-2, LR 7-1, and LR 26-
33 4, the parties, by and through their respective counsel of record, stipulate and agree
34 that there is good cause to extend the discovery deadlines in the operative discovery
35 plan [ECF No.27], as set forth below.

1 **A. Pursuant to LR 26-4(a), the parties stipulate that the following discovery**
2 **was completed:**

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4 1. The parties have served initial and supplemental disclosures pursuant to FRCP
5 26(a)(1);
6 2. Plaintiff has propounded written discovery on Defendants;
7 3. Defendants have propounded written discovery on Plaintiff;
8 4. Defendants have answered written discovery requests;
9 5. Plaintiff has answered written Discovery requests.

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11 **B. Pursuant to LR 26-4(b), the parties stipulate that they need to complete the**
12 **following discovery:**

13 1. Deposition of Plaintiff.
14 2. Deposition of Defendants.
15 3. Deposition of percipient witnesses.
16 4. Initial and Rebuttal Expert Disclosures.
17 5. Deposition of Defendant's FRCP 30(b)(6) witnesses and/or employees.
18 6. Depositions of Plaintiff's medical providers.
19 7. Depositions of each party's respective experts;
20 8. Additional Written Discovery; and
21 9. Any other discovery that may become necessary upon completion of
22 the discovery above.

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24 **C. Pursuant to LR 26-4(c), the parties stipulate an extension is needed for the**
25 **following reasons:**

26 The parties have been diligent in conducting discovery thus far. Specifically, the
27 parties have served written discovery and are in the process of getting depositions
28 set. Plaintiff would like to take the FRCP 30(b)(6) depositions of Defendants in



1 advance of the initial expert disclosure deadline. Due to the upcoming holidays and
2 the parties respective schedules, the parties now need additional time to conduct
3 the depositions in advance of the deadline to disclose experts. Additionally, the
4 parties have also been discussing potential settlement and remain hopeful that this
5 case can potentially resolve. For these reasons, there is good cause to extend the
6 discovery deadlines ninety (90) days.

7

8 **D. Pursuant to LR 26-4(d), the parties stipulate to the following proposed
9 schedule for completing all remaining discovery:**

10 The parties agree to extend all the discovery deadlines in this case by ninety (90)
11 days, as set forth below:

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13 1. Extend the discovery cut-off deadline from 2/27/23; to 5/30/23;

14 2. Extend the deadline to amend the pleadings and add parties from 12/27/22
15 to 3/27/23;

16 3. Extend the date for initial expert disclosures from 12/27/22 to 3/27/23;

17 4. Extend the date to disclose rebuttal expert witnesses from 1/26/23 to 4/26/23;

18 5. Extend the date to file dispositive motions from 3/29/23 to 6/27/23; and

19 6. Extend the date to file the Joint Pre-Trial Order from 4/29/23 to 7/28/23. If
20 dispositive motions are filed, the joint pretrial order is due thirty (30) days from
21 the entry of the court's ruling on the motions.

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1 7. Fed. R. Civ. P. 26(a)(3) Disclosures must be included in the Joint Pre-Trial Order.

2 DATED this 5th day of December 2022

3 DATED this 5th day of December 2022

4 H&P LAW

5 */s/ Bre'Ahn Brooks*

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20 DATED this 5th day of December 2022

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27 *Attorney for Defendants The Travelers
Indemnity Company and Constitution
State Services, LLC*

28 **Order**

29 IT IS HEREBY ORDERED.

30 Dated this 5th day of December, 2022.

31 
32 _____
33 Layna J. Zouchah
34 UNITED STATES MAGISTRATE JUDGE